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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

10 UNITED STATES OF AMERICA,)
11 Plaintiff,) CASE NO. 2:15-CR-00212-JCM-NJK
12)
13 vs.)
14 CHARLES PARKIN,)
15 Defendant.)
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**STIPULATION TO CONTINUE SENTENCING HEARING
(Fourth Request)**

IT IS HEREBY STIPULATED AND AGREED, between the United States of America, by and through its attorney, Christopher Chiou, Acting United States Attorney, through Simon Kung, Assistant United States Attorney; and Defendant Charles Parkin, by and through his counsel, Russell E. Marsh, Esquire, Wright Marsh & Levy, that the Sentencing Hearing currently scheduled for August 19, 2021, at 10:00 a.m. be vacated and set to a date and time convenient to this Court, but no sooner than 30 days from the current hearing date.

This stipulation is entered into for the following reasons:

1. This matter is currently set for Sentencing on August 19, 2021, at 10:00 a.m. (ECF No. 132.)
2. Counsel for Mr. Parkin continues to address a family medical situation that will require out-of-state travel in the next two weeks. In addition, Mr. Parkin has been diagnosed with

1 congestive heart failure and counsel requires some time to obtain medical documentation. Further,
2 counsel also requires additional time to prepare the Sentencing Memorandum and to prepare letters
3 of support and other documents for filing in connection with sentencing.

4 3. The parties agree to continue the Sentencing Hearing for at least 30 days. Mr. Parkin
5 is out of custody and agrees to the continuance.

6 4. Additionally, denial of this request for continuance could result in a miscarriage of
7 justice.

8 5. The additional time requested by this Stipulation is made in good faith and not for
9 purposes of delay.

10 6. This is the fourth request for a continuance of the Sentencing Hearing.

11 Dated this 6th day of August, 2021.

12 Respectfully submitted:

13 WRIGHT MARSH & LEVY

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15 BY /s/ Russell E. Marsh
16 RUSSELL E. MARSH, ESQUIRE
17 Attorney for Defendant Parkin

18 CHRISTOPHER CHIOU
19 ACTING UNITED STATES ATTORNEY

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21 BY /s/ Simon Kung
22 SIMON KUNG
23 Assistant U.S. Attorney

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)
Plaintiff,)
vs.)
CHARLES PARKIN,)
Defendant.)

CASE NO. 2:15-CR-00212-JCM-NJK
ORDER

Based on the Stipulation of the parties, the Sentencing Hearing in this matter is hereby continued. The ends of justice served by granting said continuance outweigh the best interest of the public and the defendant in a hearing, since the failure to grant said continuance would be likely to result in a miscarriage of justice, and would deny the parties herein sufficient time and the opportunity within which to be able to effectively and thoroughly prepare for the hearing, taking into account the exercise of due diligence.

IS IT HEREBY ORDERED that the Sentencing Hearing in the above-captioned matter currently scheduled for August 19, 2021, at 10:00 a.m., be vacated and continued to October 20, 2021 at 11:00 AM.

DATED: August 9, 2021

Glenn C. Mahan

JAMES C. MAHAN
United States District Judge